

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

In re:	:
SHARON MAHN,	: Chapter 7
Debtor.	: Case No. 22-11466

---

Major, Lindsey & Africa, LLC,	:
Plaintiff,	:
v.	: Adv. No. 24-ap-02822
SHARON MAHN,	:
Defendant.	:

---

**STIPULATION AND ORDER EXTENDING TIME TO FILE A MOTION UNDER §  
707 OF THE BANKRUPTCY CODE, AND/OR TO OBJECT TO DISCHARGE  
OR CHALLENGE WHETHER CERTAIN DEBTS ARE DISCHARGEABLE  
PURSUANT TO §§ 523 AND 727 OF THE BANKRUPTCY CODE**

**WHEREAS**, Sharon Mahn (the “Debtor”) filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code on November 4, 2022;

**WHEREAS**, the time to move for dismissal and/or object to discharge was to expire sixty days after the first date set for the meeting of creditors which date, in this case, was December 2, 2022;

**WHEREAS**, the last date to file a motion for dismissal under § 707 of the Bankruptcy Code and/or file a motion or complaint objecting to the discharge under §§ 523 and 727 of the Bankruptcy Code was January 31, 2023;

**WHEREAS**, the Debtor and creditor Major, Lindsey & Africa, LLC (“MLA”) previously entered into several prior agreements to extend the time for MLA to file a motion for dismissal under

§ 707 of the Bankruptcy Code and/or file a motion or complaint objecting to discharge under §§ 523 and 727 of the Bankruptcy Code (Docs. 34, 39, 47, 58, 67, and 79, ECF No. 22-11466);

**WHEREAS**, on July 5, 2024, MLA filed a complaint against Ms. Mahn under certain provisions of 11 U.S.C. § 523 as Case No. 1:24-ap-02822 and MLA agreed to extend Ms. Mahn's deadline to answer or respond to the complaint to November 1, 2024;

**WHEREAS**, on November 14, 2024, the Court entered an order in this adversary proceeding (Doc No. 14) extending Mahn's deadline to answer or otherwise plead to the Complaint to December 2, 2024 and MLA's deadline to file a motion for dismissal under § 707 of the Bankruptcy Code and/or file a motion or complaint objecting to discharge under §§ 523 and 727 of the Bankruptcy Code to 21 days after Mahn filed her responsive pleading;

**WHEREAS**, on December 2, 2024, Mahn filed a motion to dismiss the Complaint; and

**WHEREAS**, in order to enable MLA to evaluate Mahn's substantive legal and factual position on the Complaint and determine whether any further amendments or motions may be necessary, Mahn and MLA further agree to extend the time for MLA to file a motion for dismissal under § 707 of the Bankruptcy Code and/or file a motion or complaint objecting to discharge under §§ 523 and 727 of the Bankruptcy Code to 21 days after entry of an order granting Mahn's motion to dismiss or 21 days after Mahn files her answer to the Complaint, whichever is later.

**IT IS THEREFORE MUTUALLY AGREED AND STIPULATED** by and between Mahn and MLA as follows:

1. The time within which Major, Lindsey & Africa, LLC may file a motion for dismissal under § 707 of the Bankruptcy Code and/or a motion or amended complaint objecting to discharge under §§ 523 and 727 of the Bankruptcy Code is further extended to 21 days after entry of an order

granting Mahn's motion to dismiss or 21 days after Mahn files her answer to the Complaint, whichever is later.

2. This Stipulation is subject to the approval of the Bankruptcy Court.

Dated: December 10, 2024

**SMITH GAMBRELL & RUSSELL LLP**

By: /s/ Elizabeth L. Janczak  
Elizabeth L. Janczak, Esq.\*  
311 South Wacker Drive, Suite 3000  
Chicago, IL 60606-6677  
Tel.: 312.360.6722  
Fax: 312.360.6520  
Email: [ejanczak@sgrlaw.com](mailto:ejanczak@sgrlaw.com)  
\*Admitted *pro hac vice*

*Counsel to Major, Lindsey & Africa, LLC*

**STARR & STARR, PLLC**

By: /s/ Stephen Z. Starr  
Stephen Z. Starr  
260 Madison Avenue, 17<sup>th</sup> Floor  
New York, NY 10016-2401  
Tel.: 212.867.8165  
Email: [stephenstarr@starrandstarr.com](mailto:stephenstarr@starrandstarr.com)

*Counsel to Sharon Mahn*

**IT IS SO ORDERED.**

Dated: December \_\_, 2024  
New York, New York

---

MARTIN GLENN  
Chief United States Bankruptcy Judge